

"BILL OF COMPLAINT"

FRANK W. BLICKENSTAFF \* NO. 18,396 EQUITY  
VS. \* IN THE CIRCUIT COURT  
ELIZABETH CLARICE BLICKENSTAFF \* FOR FREDERICK COUNTY,  
\* MARYLAND  
\*

\* \* \* \* \*

TO THE HONORABLE, THE JUDGES OF SAID COURT:

The Bill of Complaint of Frank W. Blickenstaff, by Edwin F. Nikirk, his attorney, respectfully represents unto your Honorable Court:

First: That on the 16th day of June, 1945, Helen L. Huffer, unmarried, of Frederick County, Maryland, conveyed a certain tract or parcel of land unto Frank W. Blickenstaff, and Elizabeth Clarice Blickenstaff, as joint tenants, and not as tenants in common, with the right of survivorship, said deed being recorded in Liber 449, folio 217 &c, one of the Land Records of Frederick County, Maryland.

Second: That the said Elizabeth Clarice Blickenstaff is an infant, being at the present time 11 years of age.

Third: That the real estate mentioned in said deed amounts to 122/160's acres of land, is improved with a two and one-half story twelve room frame dwelling and is situate, lying and being in the town of Wolfsville, Catoctin District, Frederick County, Maryland, the original deed from Helen Huffer, unmarried, to Frank W. Blickenstaff and Elizabeth Clarice Blickenstaff, being filed herewith and marked "Exhibit 1" to this Bill of Complaint.

Fourth: That on the 6th day of June, 1956, your Petitioner, Frank W. Blickenstaff, together with Elizabeth Clarice Blickenstaff, entered into a contract agreement with Harold G. Harne, unmarried, for the sell of the abovementioned real estate, with the improvements thereon, at and for the sum of Three Thousand Three Hundred Dollars, (\$3,300.00), which sum is an excellent price for said parcel of land, with the improvements thereon, and your Petitioner avers that it would be to the best interest and advantage to the owners of said property, and especially for the infant dependent, to have the contract and sale ratified and confirmed by your